

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**MIICS & PARTNERS, AMERICA,
INC., *et al.***

Plaintiffs,

v.

FUNAI ELECTRIC CO., LTD, *et al.*

Defendants,

and

SAMSUNG DISPLAY CO., LTD.,

Intervenor.

Civil Action No. 1:14-cv-00804-RGA

FILED UNDER SEAL

**PLAINTIFFS' MOTION TO EXCLUDE EXPERT REPORT AND TESTIMONY OF
RYAN SULLIVAN, Ph.D. UNDER DAUBERT**

Plaintiffs MiiCs & Partners America, Inc. and Gold Charm Limited ("Plaintiffs") move to exclude the proffered testimony and opinions of Ryan Sullivan, Ph.D. on behalf of Defendants Funai Electric Co., Ltd., P&F USA, Inc., and Funai Corporation, Inc. (collectively, "Funai") for failure to comply with the Rule 702 of the Federal Rules of Evidence and *Daubert v. Merrill Dow Pharm., Inc.*, 509 U.S. 579 (1993).

The grounds for this motion are set forth in Plaintiffs' Opening Brief, submitted herewith.

Dated: May 19, 2017

Of Counsel:

Frederick A. Tecce
Stephen E. Murray
Keith Jones
Bryon T. Wasserman
One Commerce Square
2005 Market Street, Suite 2200
Philadelphia, PA 19103
Telephone: (215) 965-1330
ftecce@panitchlaw.com
smurray@panitchlaw.com
kjones@panitchlaw.com
bwasserman@panitchlaw.com

PANITCH SCHWARZE BELISARIO & NADEL, LLP

By: /s/ Aaron Ettelman

John D. Simmons (Bar No. 5996)
Dennis J. Butler (Bar No. 5981)
Aaron Ettelman (Bar No. 5003)
Wells Fargo Tower
2200 Concord Pike, Suite 201
Wilmington, DE 19803
Telephone: (302) 394-6030
jsimmons@panitchlaw.com
dbutler@panitchlaw.com
aettelman@panitchlaw.com

*Attorneys for Plaintiffs, MiiCs & Partners America,
Inc. and Gold Charm Limited*

CERTIFICATE OF SERVICE

I, Aaron Ettelman, hereby certify that on May 19, 2017, a true copy of the foregoing Plaintiffs' Motion To Exclude The Expert Report And Testimony Of Ryan Sullivan was served via the Court's electronic filing system upon all counsel of record.

/s/ Aaron Ettelman

Aaron Ettelman (Bar No. 5003)